



July 25, 2019

The Honorable Ajit Pai, Chairman
Federal Communications Commission
445 12th Street SW,
Washington, DC 20554

Dear Chairman Pai,

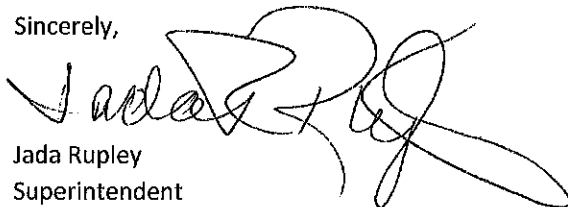
I am writing today in response to the Federal Communications Commission's (FCC) Public Notice (FCC 19-46) which considers changes to the Universal Service Fund (USF) programs, including E-Rate. First, I want to thank the FCC for its continued support for the E-Rate program and for the critical policy changes the commission adopted in 2014. The E-Rate program, and the broader USF program, is a program succeeding in its mission. However, the initial purpose of E-Rate is not yet fully realized. As the FCC moves forward with this Public Notice, it is prudent to remain focused on the fact that E-Rate continues to play a critical role in the use and expansion of high-speed connectivity in schools.

In the past five years E-Rate funds have been used by the schools in Clackamas County to prevent cybersecurity issues by updating their network security devices, supplement community bonds to fund dark fiber projects, update decade-old networking equipment, and provide daily access multi-gigabit municipal dark fiber. Our Education Service District utilizes E-Rate funds in a consortium to deliver high-speed Internet to every school in the county and passes those collective cost savings on to the ten school districts and 58,000 students we serve. Our Service District also supports state efforts to increase access via the recent creation of State of Oregon matching funds to expand high speed broadband access in the most underserved areas of this state. Access to high speed broadband is one of the most critical teaching tools of this century and lack of access can be crippling to the future academic success of students and undermines, in every aspect, our nation's global competitiveness.

I am opposed to the rule as drafted. The proposed rule conflicts with the original legislative intent of the underlying 1996 Telecommunications Act, which was explicit in its creation of two separate and distinct programs for schools/libraries and rural health care providers. The proposed rule unnecessarily pits schools/libraries against rural hospitals/clinics in such a way that both programs and the communities they support will lose. School district leaders have a responsibility to balance their budget annually and lacking certainty of funds will compromise choice on connectivity options. E-Rate must continue to support schools in gaining access to high-speed broadband. A massive overhaul of the E-Rate program that will cripple high-speed access to online education tools that are now critical for student success, especially in the most rural areas of this country, is poor policy.

Thank you for your time and for counting these among the many comments you will receive on this Public Notice.

Sincerely,



Jada Rupley
Superintendent

Lead, serve and innovate for learning.

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